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PACIFIC  TELESIS
Group-Washington

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December 16, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

EX PARTE

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

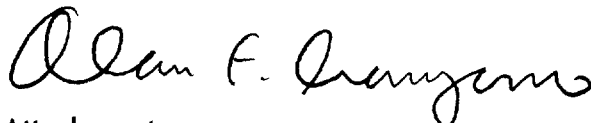
Re: *CC Docket No. 94-54, Equal Access and Interconnection Pertaining to
Commercial Mobile Radio Services*

Yesterday, Jim Tuthill of Pacific Bell, and I met with Myron Peck of the Wireless Telecommunications Bureau to discuss issues contained in the attached document which was used during the meeting. Please associate this material with the above-referenced proceeding.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

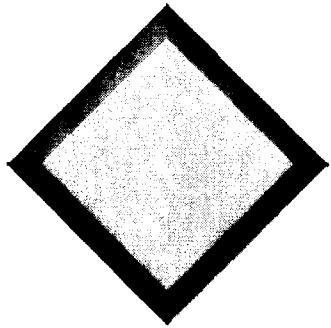


Attachment

cc: Myron Peck

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BRINGING MOBILITY TO THE MASS MARKET

PACIFIC BELL MOBILE SERVICES

CC DOCKET NO. 94-54

DECEMBER 13, 1994

PACIFIC BELL MOBILE SERVICES

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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TOPICS

- ❖ **RESALE AND NUMBER TRANSFERABILITY**
- ❖ **ROAMING**
- ❖ **EQUAL ACCESS**
- ❖ **MUTUAL COMPENSATION**
- ❖ **INTERCONNECTION**

RESALE AND NUMBER TRANSFERABILITY

- ⇒ **CELLULAR HAS A 12 YEAR HEAD START**
- ⇒ **NUMBER TRANSFERABILITY PROMOTES
COMPETITION**
 - ✓ **ALLOWS FASTER MARKET ENTRY**
- ⇒ **EXISTING RESALE RULES REMAIN IN PLACE,
NPRM, CC DOCKET NO. 94-54, PARA 123**
 - ✓ **INCLUDES RIGHT TO NUMBER
TRANSFERABILITY, APPLICATION OF GTE
MOBILNET OF HOUSTON, 1987 FCC LEXIS 3539, PARA 6.
(1987)**
- ⇒ **CELLULARS' MOTIVE IN DENYING IT IS TO
STIFLE NEW COMPETITION**

AMING

- ⇒ **COMMISSION NEEDS TO MANDATE RIGHT TO ROAM ONTO ANALOG CELLULAR**
 - ✓ **ROAMING PROVIDES UBIQUITY**
 - ✓ **GOOD FAITH NEGOTIATIONS**
 - ✓ **PROMOTES COMPETITION**
- ⇒ **CELLULAR WILL NOT VOLUNTARILY PROVIDE ROAMING TO NEW ENTRANTS**
- ⇒ **WITHOUT ROAMING, NEW ENTRANTS WILL BE AT A SIGNIFICANT DISADVANTAGE**
- ⇒ **SECTION 201 PROVIDES RIGHT TO ROAM WHICH IS REAFFIRMED IN 6002(C)(1)(B)**

EQUAL ACCESS

- ⇒ **THE SAME EQUAL ACCESS REQUIREMENTS SHOULD BE APPLIED TO ALL CMRS PROVIDERS**
- ⇒ **PROMOTES REGULATORY SYMMETRY ADOPTED BY CONGRESS AND THE COMMISSION IN CC DOCKET 93-252**
- ⇒ **SERVICE AREAS SHOULD BE MTAs**

MUTUAL COMPENSATION

⇒ PRIMARILY A STATE ISSUE

- ✓ MOST WIRELESS CALLS ARE INTRASTATE**

- ✓ COMMISSION HAS NOT PREEMPTED
TERMS AND CONDITIONS OF
INTERCONNECTION ARRANGEMENTS,
SECOND REPORT AND ORDER, DOCKET 93-252, PARA 231,
MARCH 7, 1994**

⇒ CUSTOMERS' EXPECTATIONS

- ✓ WIRELESS IS STILL DISCRETIONARY**

- ✓ LANDLINE CUSTOMERS WOULD HAVE TO
BE CHARGED**

INTERCONNECTION

- ⇒ **PRESENT SYSTEM--GOOD FAITH
NEGOTIATIONS--IS WORKING**
- ⇒ **CONSISTENT WITH FORBEARANCE ADOPTED
IN CC DOCKET 93-252**